

EXHIBIT 1

8/6/2015

<https://www.clarkcountycourts.us/Anonymous/CaseDetail.aspx?CaseID=11609035>

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Location: District Court Civil/Criminal [Help](#)**REGISTER OF ACTIONS****CASE No. A-15-720869-C**

**Michael Yazdi, Plaintiff(s) vs. Connect America.com LLC,
Defendant(s)**

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§

Case Type: **Other Civil Matters**
Date Filed: **07/02/2015**
Location: **Department 15**
Cross-Reference Case Number: **A720869**

PARTY INFORMATION

Defendant **Connect America.com LLC Doing
Business As Medical Alarm**

Lead Attorneys

Plaintiff **Yazdi, Michael R**

Scott A. Marquis
Retained
7023820711(W)

EVENTS & ORDERS OF THE COURT**OTHER EVENTS AND HEARINGS**

07/02/2015 **Complaint**
Complaint
07/13/2015 **Demand for Jury Trial**
Jury Demand
07/13/2015 **Disclosure Statement**
NRCP Rule 7.1 Disclosure Statement
07/16/2015 **Affidavit of Service**
Affidavit of Service

FINANCIAL INFORMATION

	Plaintiff Yazdi, Michael R		
	Total Financial Assessment		280.50
	Total Payments and Credits		280.50
	Balance Due as of 08/06/2015		0.00
07/02/2015	Transaction Assessment		273.50
07/02/2015	Wiznet	Receipt # 2015-69472-CCCLK	Yazdi, Michael R
07/02/2015	Wiznet	Receipt # 2015-69473-CCCLK	Yazdi, Michael R
07/14/2015	Transaction Assessment		(3.50)
07/14/2015	Wiznet	Receipt # 2015-73167-CCCLK	Yazdi, Michael R
07/14/2015	Transaction Assessment		(3.50)
07/14/2015	Wiznet	Receipt # 2015-73169-CCCLK	Yazdi, Michael R
			(3.50)

DISTRICT COURT CIVIL COVER SHEET

A-15-720869-C

Clark County, Nevada

XV

Case No. _____
(Assigned by Clerk's Office)**I. Party Information** (provide both home and mailing addresses if different)

Plaintiff(s) (name/address/phone):

MICHAEL R. YAZDI, individually and on behalf of all persons similarly situated

Defendant(s) (name/address/phone):

CONNECT AMERICA.COM, LLC a Delaware limited liability company dba MEDICAL ALARM, et al.

Attorney (name/address/phone):

Scott A. Marquis, Esq. (NV Bar No. 6407)

Marquis Aurbach Coffing

10001 Park Run Drive

Las Vegas, NV 89145

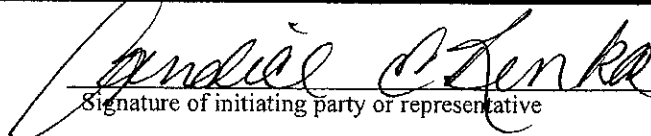
(702) 382-0711

Attorney (name/address/phone):

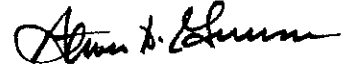
II. Nature of Controversy (Please select the one most applicable filing type below)**Civil Case Filing Types**

Real Property	Torts	
Landlord/Tenant <input type="checkbox"/> Unlawful Detainer <input type="checkbox"/> Other Landlord/Tenant Title to Property <input type="checkbox"/> Judicial Foreclosure <input type="checkbox"/> Other Title to Property Other Real Property <input type="checkbox"/> Condemnation/Eminent Domain <input type="checkbox"/> Other Real Property	Negligence <input type="checkbox"/> Auto <input type="checkbox"/> Premises Liability <input type="checkbox"/> Other Negligence Malpractice <input type="checkbox"/> Medical/Dental <input type="checkbox"/> Legal <input type="checkbox"/> Accounting <input type="checkbox"/> Other Malpractice	Other Torts <input type="checkbox"/> Product Liability <input type="checkbox"/> Intentional Misconduct <input type="checkbox"/> Employment Tort <input type="checkbox"/> Insurance Tort <input type="checkbox"/> Other Tort
Probate	Construction Defect & Contract	Judicial Review/Appeal
Probate (select case type and estate value) <input type="checkbox"/> Summary Administration <input type="checkbox"/> General Administration <input type="checkbox"/> Special Administration <input type="checkbox"/> Set Aside <input type="checkbox"/> Trust/Conservatorship <input type="checkbox"/> Other Probate Estate Value <input type="checkbox"/> Over \$200,000 <input type="checkbox"/> Between \$100,000 and \$200,000 <input type="checkbox"/> Under \$100,000 or Unknown <input type="checkbox"/> Under \$2,500	Construction Defect <input type="checkbox"/> Chapter 40 <input type="checkbox"/> Other Construction Defect Contract Case <input type="checkbox"/> Uniform Commercial Code <input type="checkbox"/> Building and Construction <input type="checkbox"/> Insurance Carrier <input type="checkbox"/> Commercial Instrument <input type="checkbox"/> Collection of Accounts <input type="checkbox"/> Employment Contract <input type="checkbox"/> Other Contract	Judicial Review <input type="checkbox"/> Foreclosure Mediation Case <input type="checkbox"/> Petition to Seal Records <input type="checkbox"/> Mental Competency Nevada State Agency Appeal <input type="checkbox"/> Department of Motor Vehicle <input type="checkbox"/> Worker's Compensation <input type="checkbox"/> Other Nevada State Agency Appeal Other <input type="checkbox"/> Appeal from Lower Court <input type="checkbox"/> Other Judicial Review/Appeal
Civil Writ		Other Civil Filing
Civil Writ <input type="checkbox"/> Writ of Habeas Corpus <input type="checkbox"/> Writ of Mandamus <input type="checkbox"/> Writ of Quo Warrant <input type="checkbox"/> Writ of Prohibition <input type="checkbox"/> Other Civil Writ		Other Civil Filing <input type="checkbox"/> Compromise of Minor's Claim <input type="checkbox"/> Foreign Judgment <input checked="" type="checkbox"/> Other Civil Matters

Business Court filings should be filed using the Business Court civil coversheet.

7/2/15
Date

 Signature of initiating party or representative

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CLERK OF THE COURT

Marquis Aurbach Coffing
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Candice E. Renka, Esq.
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crenka@maclaw.com
Attorneys for Plaintiff

DISTRICT COURT

CLARK COUNTY, NEVADA

MICHAEL R. YAZDI, individually and on
behalf of all persons similarly situated,

Case No.: A-15-720869-C
Dept. No.: XV

Plaintiff,

vs.

COMPLAINT

CONNECT AMERICA.COM, LLC a Delaware
limited liability company dba MEDICAL
ALARM; DOES I through X, inclusive; and
ROE CORPORATIONS I through X, inclusive,

**ARBITRATION EXEMPTION
REQUESTED: CLASS ACTION
COMPLAINT**

Defendants.

Plaintiff Michael R. Yazdi (hereinafter "Plaintiff") by and through his attorneys of
record, the law firm of Marquis Aurbach Coffing, alleges and complains as follows:

PARTIES

1. Plaintiff MICHAEL R. YAZDI is and was at all times relevant herein, an
individual who resides in Clark County, Nevada.

2. Defendant CONNECT AMERICA.COM, LLC is a Delaware limited liability
company dba MEDICAL ALARM is and was at all times relevant herein, a Delaware limited
liability company doing business in Clark County, Nevada.

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3. The names and capacities, whether individuals, corporate, associate or otherwise of Defendants named herein as DOE and ROE CORPORATION are unknown or not yet confirmed. Upon information and belief, said DOE and ROE CORPORATION Defendants are responsible for damages suffered by Plaintiff and, therefore, Plaintiff sues said Defendants by such fictitious names. Plaintiff will ask leave to amend this Complaint to show the true names and capacities of each DOE and ROE CORPORATION Defendant at such time as the same has been ascertained.

JURISDICTION AND VENUE

4. This Court possesses subject matter jurisdiction over this matter because Clark County, Nevada is the judicial district in which a substantial part of the events or omissions giving rise to the claims set forth herein occurred.

NATURE OF THE ACTION

5. This is a proposed class action brought on behalf of consumers that received telemarketing calls to their cell phones made by using a prerecorded voice or an automated telephone dialing system ("ATDS") by or on behalf of Defendant, for which calls the Defendant never obtained express, written consent from the consumers.

6. Plaintiff alleges that Defendant's use of a prerecorded voice or an ATDS to make telemarketing phone calls to consumers' cell phones without prior express, written consent violates the Telephone Consumer Protection Act of 1991 ("TCPA"), 47 U.S.C. § 227, and the Nevada Deceptive Trade Practices Act, ("NVDTPA"), NRS Chapter 598. Moreover, a violation of the TCPA is a *per se* violation of the NVDTPA. NRS 598.023(3).

7. The TCPA, as interpreted by Federal Communications Commission ("FCC") prohibits the use of a prerecorded voice or an ATDS to make telemarketing calls to consumers' cell phones unless the consumer has provided express, written consent.

8. Plaintiff brings this action in his individual capacity and on behalf of the classes of persons similarly situated, as defined below.

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GENERAL ALLEGATIONS

9. Defendant is a company that sells medical alert alarm systems to consumers.

10. Defendant operates at least two websites: connectamerica.com ("Connect America Website") and medicalalarm.com ("Medical Alarm Website").

11. The Connect America Website identifies several "Connect America Brands," including Medical Alert, Medical Alarm System, Alert Buddy, Guardian On Call, Silent Caregiver, MedicalAlarm.com, Medical Alert System.com, LibertyAlert, and iCare Alert.

12. The Medical Alarm Website is similar, and the logo identifies Medical Alarm as "a Connect America.com, LLC Company."

13. On or about March 19, 2015 at approximately 8:00 a.m., Plaintiff received a call on his cell phone, and when he answered it was a prerecorded voice message from Defendant attempting to sell Plaintiff a medical alarm system.

14. The call came from telephone number (909) 620-6597.

15. The prerecorded message was generic, attempting to sell Plaintiff a medical alarm system.

16. Plaintiff did not provide Defendant his cell phone number.

17. The purpose of using a prerecorded voice message is to reach as many consumers as possible as efficiently and cheaply as possible, which purpose would best be served using an ATDS.

18. Upon information and belief, Defendant made the call using equipment which has the capacity to store or produce telephone numbers to be called using a random or sequential number generator and to dial such numbers.

19. Upon information and belief, Defendant made the call using an ATDS.

20. Plaintiff received the call on his cell phone while he was in Las Vegas, Nevada.

21. Plaintiff has never done business with Defendant. Plaintiff has never provided Defendant express, written consent to receive telemarketing calls made using a prerecorded voice or an ATDS to Plaintiff's cell phone.

22. Defendant knew or should have known that it did not have the prior express, written consent of Plaintiff or any other members of the classes to use a prerecorded voice or an ATDS to make telemarketing calls to their cell phones.

23. As a result of Defendant's conduct, class members have suffered damages in that they have been charged by their cell phone carrier for minutes, time, or usage for the calls made by Defendant.

24. As a result of Defendant's conduct, class members have suffered a violation of their right to privacy.

25. As a result of Defendant's conduct, class members have suffered a violation of their rights under the TCPA and the NVDTPA.

CLASS ALLEGATIONS

NATIONAL CLASS

26. Plaintiff brings this action pursuant to NRCP 23 as a class action on behalf of himself and on behalf of a National Class defined as:

ALL PERSONS RESIDING IN THE UNITED STATES WHO RECEIVED A TELEMARKETING CALL ON THEIR CELL PHONE, USING A PRERECORDED VOICE OR AN AUTOMATED TELEPHONE DIALING SYSTEM, BY OR ON BEHALF OF DEFENDANT, WITHIN THE FOUR YEARS PRIOR TO THE DATE OF THE FILING OF THIS COMPLAINT.

27. Plaintiff and members of the National Class received telemarketing calls to their cell phones, made using a prerecorded voice or an ATDS by or on behalf of Defendant and had not provided Defendant express, written consent to receive such calls, within the four years prior to the date of the filing of this Complaint, in violation of the TCPA.

NEVADA CLASS

28. Plaintiff also brings this action on behalf of a Class comprised of Nevada residents ("Nevada Class") defined as:

ALL PERSONS RESIDING IN NEVADA WHO RECEIVED A TELEMARKETING CALL ON THEIR CELL PHONE, USING A PRERECORDED VOICE OR AN AUTOMATED TELEPHONE DIALING SYSTEM, BY OR ON BEHALF OF DEFENDANT, WITHIN THE FOUR YEARS PRIOR TO THE DATE OF THE FILING OF THIS COMPLAINT.

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29. Plaintiff and members of the Nevada Class received telemarketing calls to their cell phones, using a prerecorded voice or an ATDS by or on behalf of Defendant and had not provided Defendant express, written consent to receive such calls, within the four years prior to the date of the filing of this Complaint, in violation of the NVDTPA.

30. The requirements for maintaining this action as a class action under Rule 23 of the Nevada Rules of Civil procedure are satisfied:

31. **NUMEROSITY:** It is impracticable to bring all members of the National Class and the Nevada Class (collectively, "Class Members") before the Court. Plaintiff estimates that there are thousands of Class Members, geographically spread throughout the United States, and that their identities can be ascertained from Defendant's books and records. Attempting to join and name each Class member as a Co-Plaintiff would be unreasonable and impracticable.

32. **COMMONALITY:** There is a well-defined commonality of interest in the questions of law and fact involving Class Members in that all Class Members received telemarketing calls, made using a prerecorded voice or an ATDS, to their cell phones, from Defendant in violation of the TCPA and NVDTPA.

33. **PREDOMINANCE:** There are questions of law and fact common to the Class Members, which are identical for each Class Member and which predominate over the questions affecting the individual Class Members, if any, which include:

- a. Whether Defendant violated the TCPA and the NVDTPA when using a prerecorded voice or an ATDS to make telemarketing calls to Class Members' cell phones without express, written consent;
- b. Whether Defendant used a prerecorded voice to make the calls;
- c. Whether Defendant used an ATDS to make the calls;
- d. Whether the calls were telemarketing calls;
- e. Whether the calls were made to Class Members' cell phones;
- f. Whether the Class Members provided express, written consent to receive the calls;

1 g. Whether Plaintiff and Class Members are entitled to damages under the
2 TCPA;

3 h. Whether Plaintiff and Class Members are entitled to damages under the
4 NVDTPA;

5 i. Whether Plaintiff and Class Members are entitled to treble damages under
6 the TCPA; and

7 j. Whether Plaintiff and Class Members are entitled to injunctive relief under
8 the TCPA.

9 34. **TYPICALITY:** The claims of the Plaintiff are typical of the Class Members in
10 that Plaintiff is informed and believes that each Class Member received a telemarketing call from
11 Defendant, made using a prerecorded voice or an ATDS to their cell phone without having
12 provided express, written consent to Defendant. Also, there is uniformity in the federal and
13 state legislation prohibiting the practice complained of and providing statutory damages that may
14 be pursued in state court. In this action, Plaintiff and the Class Members seek an injunction
15 prohibiting Defendant's using a prerecorded voice or an ATDS to make telemarketing calls to
16 consumers' cell phones without express, written consent; damages; attorney fees; and costs
17 incurred in the prosecution of this action.

18 35. **ADEQUACY:** Plaintiff is willing to devote the time necessary to serve as
19 representative of the National Class and the Nevada Class and work with class counsel.
20 Plaintiff's attorneys are experienced and knowledgeable in class action litigation in Nevada, and
21 they will fairly and adequately represent the interests of the National Class and the Nevada Class
22 and have no interests antagonistic to the class.

23 36. **SUPERIORITY:** There is no plain, speedy or adequate remedy other than
24 maintenance of this class action since Plaintiff is informed and believes that a class action is
25 superior to any other available means for the adjudication of this controversy.

26 37. This action will cause an orderly and expeditious administration of the Class
27 Members' claims. A class action will save time, effort and expense, and will ensure uniformity
28 of decisions at the lowest cost and with the least toll on judicial resources.

38. Because the loss suffered by individual Class Members may be relatively small, the expense and burden of individual litigation makes it impracticable for the Class Members to individually seek redress. Plaintiff believes that Class Members, to the extent they are aware of their rights against Defendant, would be unable to secure counsel to litigate their claims on an individual basis because of the relatively small nature of the individual damages warranted and/or the value of individual injunctive relief.

39. Hence, a class action is the only feasible means of recovery for the Class Members. Furthermore, without a class action, Class Members will continue to suffer damages and Defendant will continue to violate federal and state law, retaining and reaping the proceeds of their wrongful marketing practices.

MANAGEABILITY: There are no manageability problems due to variations in state laws or choice of law provisions, because the TCPA applies to the claims of all the Class Members asserted herein, and Nevada law applies to the Nevada Class. Further, the evidence proving Defendant's violation of the statutes is ascertainable through discovery. The identities of the Class Members are known by Defendant, and damages can be calculated from Defendant's records. Thus, this action poses no unusual difficulties that would impede its management by the Court as a class action.

FIRST CLAIM FOR RELIEF

(Violation of the Telephone Consumer Protection Act 47 USC § 227 *et seq.*)

40. Plaintiff repeats and realleges the paragraphs above as though fully stated herein.

41. Defendant used a prerecorded voice or an ATDS to make telemarketing calls to the Class Members' cell phones without express, written consent from the Class Members.

42. By using an ATDS, Defendant was able to effectively send thousands of telemarketing calls to thousands of consumers' cell phone numbers.

43. Defendant's calls were made using an artificial prerecorded voice. By using an ATDS and a prerecorded message, Defendant is able to simultaneously call thousands of wireless customers without any human intervention and at very little cost to Defendant.

44. Upon information and belief, Defendant used the prerecorded voice or an ATDS to make the calls or had a high degree of involvement in the making of the calls. For example, Defendant:

- a. Knew that the calls were being made with an ATDS;
- b. Knew that the calls were being made using a prerecorded voice;
- c. Knew that the calls were telemarketing calls;
- d. Knew that the calls were being made to Class Members' cell phones;
- e. Knew that the Class Members had not provided express, written consent to receive such calls;
- f. Participated in preparing the content of the calls or messages;
- g. Provided or obtained the cell numbers of the Class Members; and
- h. Received compensation for or a benefit from making such calls.

45. As a result of Defendant's conduct, Plaintiff and the Class Members have suffered damages by being charged by their cell phone carriers for the minutes, time, or usage for the calls made by Defendant; have suffered a violation of their right to privacy; and have suffered a violation of their rights under the TCPA and the NVDTPA.

46. It has become necessary for Plaintiff and Class Members to engage the services of an attorney to prosecute this action; therefore, Plaintiff and Class Members are entitled to costs and attorney fees as special damages.

SECOND CLAIM FOR RELIEF

(Violation of the Nevada Deceptive Trade Practices Act NRS Chapter 598)

47. Plaintiff repeats and realleges the paragraphs above as though fully stated herein.

48. Defendant willfully and knowingly violated the TCPA, which is a statute relating to the sale or lease of goods or services. NRS 41.600; NRS 598.0923(3).

49. Defendant engaged in a deceptive trade practice.

50. As a direct and proximate result of Defendant's deceptive trade practice, Plaintiff and Nevada Class Members have suffered damages in an amount to be proven at trial.

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1 51. Plaintiff and Nevada Class Members are victims of consumer fraud and are
2 therefore entitled to damages as well as attorney fees and costs. NRS 41.600.

3 52. It has become necessary for Plaintiff and Class Members to engage the services of
4 an attorney to prosecute this action; therefore, Plaintiff and Class Members are entitled to costs
5 and attorney fees as special damages.

6 **THIRD CLAIM FOR RELIEF**

7 **(Declaratory Relief)**

8 53. Plaintiff repeats and realleges the paragraphs above as though fully stated herein.

9 54. A genuine dispute exists between the parties regarding the Defendant's illegal
10 calls to Plaintiff and Class Members.

11 55. The interests of the parties are adverse.

12 56. This Court should declare that based upon the Defendant's violation of federal
13 and Nevada law, that Plaintiff and Class Members are entitled to \$500 damages per call, treble
14 damages for each call, injunctive relief, attorney fees, and costs.

15 57. It has become necessary for Plaintiff and Class Members to engage the services of
16 an attorney to prosecute this action; therefore, Plaintiff and Class Members are entitled to costs
17 and attorney fees as special damages.

18 **PRAYER FOR RELIEF**

19 WHEREFORE, Plaintiff prays for the following relief against Defendant:

20 1. Certification of the National Class and Nevada Class;

21 2. A Declaration that Defendant has violated the TCPA because it failed to obtain
22 express, written consent to make the calls to Plaintiff or the Class Members;

23 3. Judgment in the amount of \$500 for Plaintiff and each member of the National
24 Class and the Nevada Class for statutory damages for each call received by them from
25 Defendant;

26 4. Judgment in the amount equal to three times the damages to Plaintiff and the
27 Class Members under the TCPA;
28

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Dated this 2nd day of July, 2015.

By Scott A. Marquis, Esq.
Scott A. Marquis, Esq.

Scott A. Marquis, Esq.

Nevada Bar No. 6407

Candice E. Renka, Esq.

Nevada Bar No. 11447

10001 Park Run Drive

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Attorneys for Plaintiff

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Attorneys for Plaintiff

DISTRICT COURT

CLARK COUNTY, NEVADA

MICHAEL R. YAZDI, individually and on
behalf of all persons similarly situated,

Plaintiff,

vs.

CONNECT AMERICA.COM, LLC a Delaware
limited liability company dba MEDICAL
ALARM; DOES I through X, inclusive; and
ROE CORPORATIONS I through X, inclusive,

Defendants.

INITIAL APPEARANCE FEE DISCLOSURE

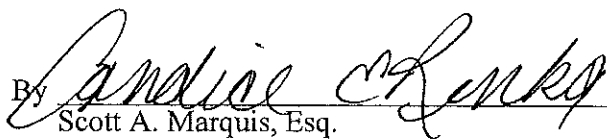
Pursuant to NRS Chapter 19, as amended by Senate Bill 106, filing fees are submitted for
parties appearing in the above-entitled action as indicated below:

MICHAEL R. YAZDI \$270.00

TOTAL REMITTED **\$270.00**

Dated this 2nd day of July, 2015.

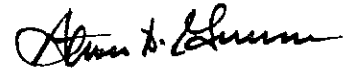
MARQUIS AURBACH COFFING

By 

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Attorneys for Plaintiff

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CLERK OF THE COURT

DISTRICT COURT
CLARK COUNTY, NEVADA

MICHAEL R. YAZDI, individually and on
behalf of all persons similarly situated,

Plaintiff,

vs.

Case No.: A-15-720869-C
Dept. No.: XV

CONNECT AMERICA.COM, LLC a Delaware
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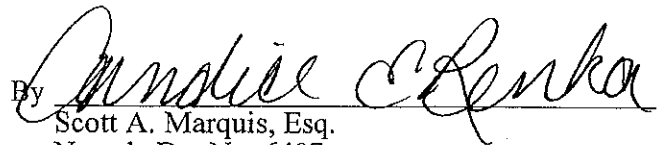
Defendants.

JURY DEMAND

Plaintiff, Michael R. Yazdi, by and through his counsel of record, the law firm of
Marquis Aurbach Coffing, hereby demands a jury trial of all the issues in the above-entitled
matter.

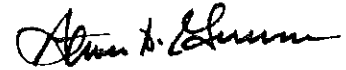
Dated this 13th day of July, 2015.

MARQUIS AURBACH COFFING

By 
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Attorneys for Plaintiff

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Attorneys for Plaintiff


CLERK OF THE COURT

DISTRICT COURT

CLARK COUNTY, NEVADA

MICHAEL R. YAZDI, individually and on
behalf of all persons similarly situated,

Plaintiff,

vs.

Case No.: A-15-720869-C
Dept. No.: XV

CONNECT AMERICA.COM, LLC a Delaware
limited liability company dba MEDICAL
ALARM; DOES I through X, inclusive; and
ROE CORPORATIONS I through X, inclusive,

Defendants.

NRCP RULE 7.1 DISCLOSURE STATEMENT

The undersigned counsel of record certifies that the following are persons and entities as described in NRCP 7.1, and must be disclosed. These representations are made in order that the judges of this court may evaluate possible disqualification or recusal.

1. Michael R. Yazdi is an individual.

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1 2. Plaintiff is unaware if Defendants have any parent corporation or whether any
2 publicly held corporation owns 10% or more of Defendants' stock.

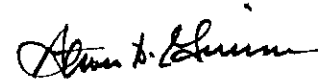
3 Dated this 13th day of July, 2015.

4
5 MARQUIS AURBACH COFFING

6
7 By Candice E. Renka
8 Scott A. Marquis, Esq.
9 Nevada Bar No. 6407
10 Candice E. Renka, Esq.
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14 Attorneys for Plaintiff

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CLERK OF THE COURT

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10 smarquis@maclaw.com
11 crenka@maclaw.com
12 Attorneys for Plaintiff

8 **DISTRICT COURT**

9 **CLARK COUNTY, NEVADA**

10 MICHAEL R. YAZDI, individually and on
11 behalf of all persons similarly situated,

12 Plaintiff,

13 vs.

14 CONNECT AMERICA.COM, LLC a Delaware
15 limited liability company dba MEDICAL
16 ALARM; DOES I through X, inclusive; and
17 ROE CORPORATIONS I through X, inclusive,

18 Defendants.

Case No.: A-15-720869-C
Dept. No.: XV

19 **AFFIDAVIT OF SERVICE**

20 ///

21 ///

22 ///

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Affidavit of Process Server

DISTRICT COURT CLARK COUNTY STATE OF NEVADA

MICHAEL R. YAZDI

VS CONNECT AMERICA.COM, LLC, et al.

A-15-720869-C

PLAINTIFF/PETITIONER

DEFENDANT/RESPONDENT

CASE NUMBER

KEVIN S. DUNN

being first duly sworn, depose and say: that I am over the age of 18 years and not a party to this action, and that within the boundaries of the state where service was effected, I was authorized by law to perform said service. RECEIVED 7/8/15

Service: I served CONNECT AMERICA.COM, LLC, dba MEDICAL ALARM
NAME OF PERSON / ENTITY BEING SERVED

with (list documents) SUMMONS & COMPLAINT

by leaving with KATHLEEN MOORE
NAME

AUTHORIZED PERSON
RELATIONSHIP

At

☐ Residence

ADDRESS

CITY / STATE

☒ Business

DELAWARE REGISTERED AGENTS AND INCORPORATORS, LLC 19 KRIS CT., NEWARK, DE 19702
ADDRESS CITY / STATE

On 7/9/15

DATE

AT 3:05 PM

TIME

Thereafter copies of the documents were mailed by prepaid, first class mail on

DATE

from

CITY

STATE

ZIP

Manner of Service:

☒ CORPORATE SERVICE☐ Personal: By personally delivering copies to the person being served.☐ Substituted at Residence: By leaving copies at the dwelling house or usual place of abode of the person being served with a member of the household over the age of 18 and explaining the general nature of the papers.☐ Substituted at Business: By leaving, during office hours, copies at the office of the person/entity being served with the person apparently in charge thereof.☐ Posting: By posting copies in a conspicuous manner to the front door of the person/entity being served.☐ Non-Service: After due search, careful inquiry and diligent attempts at the address (es) listed above, I have been unable to effect process upon the person/entity being served because of the following reason(s):☐ Unknown at Address☐ Moved, Left no Forwarding☐ Service Cancelled by Litigant☐ Unable to Serve in Timely Fashion☐ Address Does Not Exist☐ Other

Service Attempts: Service was attempted on: (1)

DATE

TIME

(2)

DATE

TIME

(3)

DATE

TIME

(4)

DATE

TIME

(5)

DATE

TIME

AGE

50

Sex F

Race W

Height 5'5

Weight 160

HAIR BROWN

SIGNATURE OF PROCESS SERVER

KEVIN S. DUNN

SUBSCRIBED AND SWORN in the State of Delaware, New Castle County before me this 9TH day of JULY, 2015.

MELISSA HARMON
NOTARY PUBLIC
STATE OF DELAWARE
My Commission Expires 12/29/2015

SIGNATURE OF NOTARY PUBLIC

NOTARY PUBLIC for the state of DELAWARE

MARQUIS AURBACH COFFING

10001 Park Run Drive
Las Vegas, Nevada 89145
(702) 382-0711 FAX: (702) 382-5816

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Scott A. Marquis, Esq.
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smarquis@maclaw.com
crenka@maclaw.com
Attorneys for Plaintiff

DISTRICT COURT

CLARK COUNTY, NEVADA

MICHAEL R. YAZDI, individually and on
behalf of all persons similarly situated,

Plaintiff,

vs.

CONNECT AMERICA.COM, LLC a Delaware
limited liability company dba MEDICAL
ALARM; DOES I through X, inclusive; and
ROE CORPORATIONS I through X, inclusive,

Defendants.

Case No.: A-15-720869-C
Dept. No.: XV

SUMMONS - CIVIL

**NOTICE! YOU HAVE BEEN SUED. THE COURT MAY DECIDE AGAINST YOU
WITHOUT YOUR BEING HEARD UNLESS YOU RESPOND WITHIN 20 DAYS.
READ THE INFORMATION BELOW.**

**CONNECT AMERICA.COM, LLC a Delaware limited liability company
dba MEDICAL ALARM**

TO THE DEFENDANT(S): A civil Complaint has been filed by the Plaintiff(s) against
you for the relief set forth in the Complaint.

1. If you intend to defend this lawsuit, within 20 days after this Summons is served
on you, exclusive of the day of service, you must do the following:

MARQUIS AURBACH COFFING

10001 Park Run Drive
Las Vegas, Nevada 89145
(702) 382-0711 FAX: (702) 382-5816

(a) File with the Clerk of this Court, whose address is shown below, a formal written response to the Complaint in accordance with the rules of the Court, with the appropriate filing fee.

(b) Serve a copy of your response upon the attorney whose name and address is shown below.

2. Unless you respond, your default will be entered upon application of the Plaintiff(s) and failure to so respond will result in a judgment of default against you for the relief demanded in the Complaint, which could result in the taking of money or property or other relief requested in the Complaint.

3. If you intend to seek the advice of an attorney in this matter, you should do so promptly so that your response may be filed on time.

4. The State of Nevada, its political subdivisions, agencies, officers, employees, board members, commission members and legislators each have 45 days after service of this Summons within which to file an Answer or other responsive pleading to the Complaint.

STEVEN D. GRIERSON
CLERK OF COURT

By: Kory Schlitz JUL 07 2015
Deputy Clerk Date
Regional Justice Center
200 Lewis Avenue KORY SCHLITZ
Las Vegas, NV 89155

Issued at the direction of:

MARQUIS AURBACH COFFING

By: Candice E. Renka
Scott A. Marquis, Esq.
Nevada Bar No. 6407
Candice E. Renka, Esq.
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